

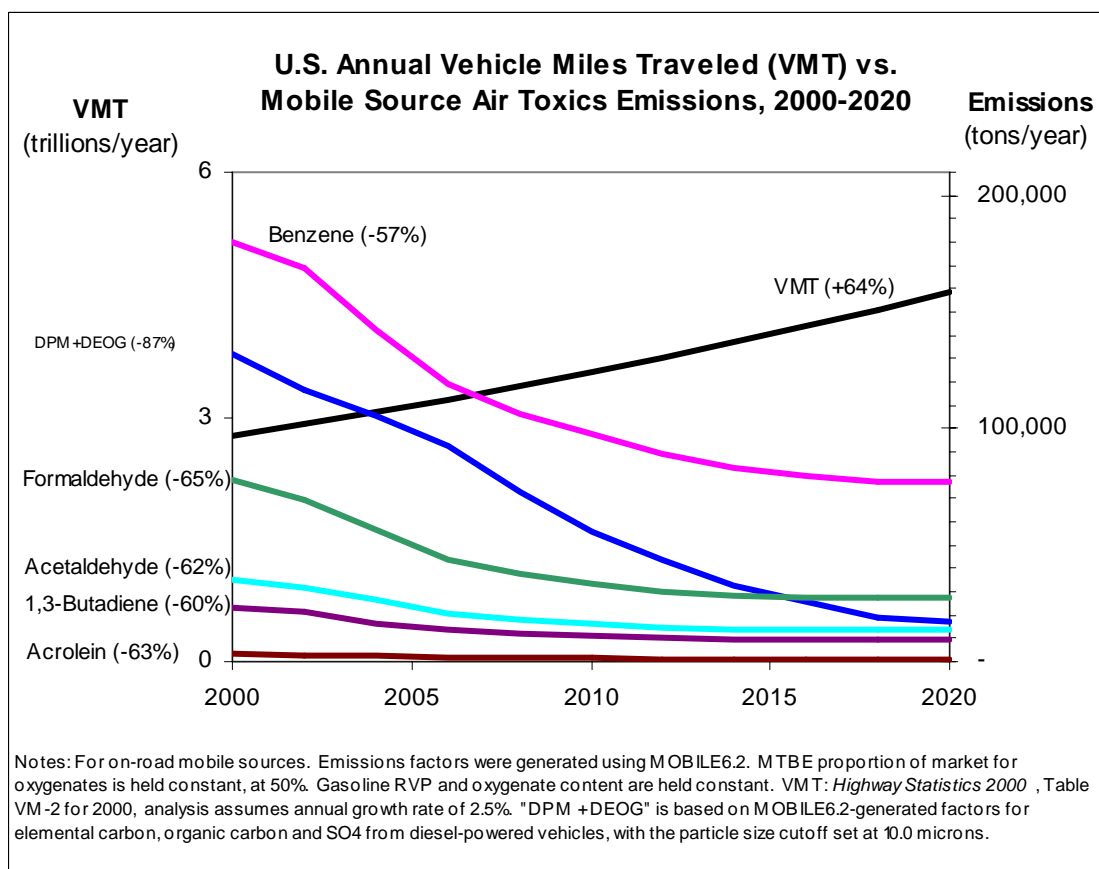
COMPLIANCE WITH 40 CFR 1502.22

Mobile Source Air Toxics

In addition to the criteria air pollutants for which there are National Ambient Air Quality Standards (NAAQS), EPA also regulates air toxics. Most air toxics originate from human-made sources, including on-road mobile sources, non-road mobile sources (e.g., airplanes), area sources (e.g., dry cleaners) and stationary sources (e.g., factories or refineries).

Mobile Source Air Toxics (MSATs) are a subset of the 188 air toxics defined by the Clean Air Act. The MSATs are compounds emitted from highway vehicles and non-road equipment. Some toxic compounds are present in fuel and are emitted to the air when the fuel evaporates or passes through the engine unburned. Other toxics are emitted from the incomplete combustion of fuels or as secondary combustion products. Metal air toxics also result from engine wear or from impurities in oil or gasoline.

The EPA is the lead Federal Agency for administering the Clean Air Act and has certain responsibilities regarding the health effects of MSATs. The EPA issued a Final Rule on Controlling Emissions of Hazardous Air Pollutants from Mobile Sources. 66 FR 17229 (March 29, 2001). This rule was issued under the authority in Section 202 of the Clean Air Act. In its rule, EPA examined the impacts of existing and newly promulgated mobile source control programs, including its reformulated gasoline (RFG) program, its national low emission vehicle (NLEV) standards, its Tier 2 motor vehicle emissions standards and gasoline sulfur control requirements, and its proposed heavy duty engine and vehicle standards and on-highway diesel fuel sulfur control requirements. Between 2000 and 2020, FHWA projects that even with a 64 percent increase in VMT, these programs will reduce on-highway emissions of benzene, formaldehyde, 1,3-butadiene, and acetaldehyde by 57 percent to 65 percent, and will reduce on-highway diesel PM emissions by 87 percent, as shown in the following graph:



As a result, EPA concluded that no further motor vehicle emissions standards or fuel standards were necessary to further control MSATs. The agency is preparing another rule under authority of CAA Section 202(l) that will address these issues and could make adjustments to the full 21 and the primary six MSATs.

Unavailable Information for Project Specific MSAT Impact Analysis

This EIS includes a basic analysis of the likely MSAT emission impacts of this project. However, available technical tools do not enable us to predict the project-specific health impacts of the emission changes associated with the alternatives in this EIS. Due to these limitations, the following discussion is included in accordance with CEQ regulations (40 CFR 1502.22(b)) regarding incomplete or unavailable information:

Information that is Unavailable or Incomplete. Evaluating the environmental and health impacts from MSATs on a proposed highway project would involve several key elements, including emissions modeling, dispersion modeling in order to estimate ambient concentrations resulting from the estimated emissions, exposure modeling in order to estimate human exposure to the estimated concentrations, and then final determination of health impacts based on the estimated exposure. Each of these steps is encumbered by technical shortcomings or uncertain science that prevents a more complete determination of the MSAT health impacts of this project.

1. Emissions: The EPA tools to estimate MSAT emissions from motor vehicles are not sensitive to key variables determining emissions of MSATs in the context of highway projects. While MOBILE 6.2 is used to predict emissions at a regional level, it has limited applicability at the project level. MOBILE 6.2 is a trip-based model--emission factors are projected based on a typical trip of 7.5 miles, and on average speeds for this typical trip. This means that MOBILE 6.2 does not have the ability to predict emission factors for a specific vehicle operating condition at a specific location at a specific time. Because of this limitation, MOBILE 6.2 can only approximate the operating speeds and levels of congestion likely to be present on the largest-scale projects, and cannot adequately capture emissions effects of smaller projects. For particulate matter, the model results are not sensitive to average trip speed, although the other MSAT emission rates do change with changes in trip speed. Also, the emissions rates used in MOBILE 6.2 for both particulate matter and MSATs are based on a limited number of tests of mostly older-technology vehicles. Lastly, in its discussions of PM under the conformity rule, EPA has identified problems with MOBILE6.2 as an obstacle to quantitative analysis.

These deficiencies compromise the capability of MOBILE 6.2 to estimate MSAT emissions. MOBILE6.2 is an adequate tool for projecting emissions trends, and performing relative analyses between alternatives for very large projects, but it is not sensitive enough to capture the effects of travel changes tied to smaller projects or to predict emissions near specific roadside locations.

2. Dispersion. The tools to predict how MSATs disperse are also limited. The EPA's current regulatory models, CALINE3 and CAL3QHC, were developed and validated more than a decade ago for the purpose of predicting episodic concentrations of carbon monoxide to determine compliance with the NAAQS. The performance of dispersion models is more accurate for predicting maximum concentrations that can occur at some time at some location within a geographic area. This limitation makes it difficult to predict accurate exposure patterns at specific times at specific highway project locations across an urban area to assess potential health risk. The NCHRP is conducting research on best practices in applying models and other technical methods in the analysis of MSATs. This work also will focus on identifying appropriate methods of documenting and communicating MSAT impacts in the NEPA process and to the general public. Along with these general limitations of dispersion models, FHWA is also faced with a lack of monitoring data in most areas for use in establishing project-specific MSAT background concentrations.
3. Exposure Levels and Health Effects. Finally, even if emission levels and concentrations of MSATs could be accurately predicted, shortcomings in current techniques for exposure assessment and risk analysis preclude us from reaching meaningful conclusions about project-specific health impacts. Exposure assessments are difficult because it is difficult to accurately calculate annual concentrations of MSATs near roadways, and to determine the portion of a year

that people are actually exposed to those concentrations at a specific location. These difficulties are magnified for 70-year cancer assessments, particularly because unsupportable assumptions would have to be made regarding changes in travel patterns and vehicle technology (which affects emissions rates) over a 70-year period. There are also considerable uncertainties associated with the existing estimates of toxicity of the various MSATs, because of factors such as low-dose extrapolation and translation of occupational exposure data to the general population. Because of these shortcomings, any calculated difference in health impacts between alternatives is likely to be much smaller than the uncertainties associated with calculating the impacts. Consequently, the results of such assessments would not be useful to decision makers, who would need to weigh this information against other project impacts that are better suited for quantitative analysis.

Summary of Existing Credible Scientific Evidence Relevant to Evaluating the Impacts of MSATs.

Research into the health impacts of MSATs is ongoing. For different emission types, there are a variety of studies that show that some either are statistically associated with adverse health outcomes through epidemiological studies (frequently based on emissions levels found in occupational settings) or that animals demonstrate adverse health outcomes when exposed to large doses.

Exposure to toxics has been a focus of a number of EPA efforts. Most notably, the agency conducted the National Air Toxics Assessment (NATA) in 1996 to evaluate modeled estimates of human exposure applicable to the county level. While not intended for use as a measure of or benchmark for local exposure, the modeled estimates in the NATA database best illustrate the levels of various toxics when aggregated to a national or State level.

The EPA is in the process of assessing the risks of various kinds of exposures to these pollutants. The EPA Integrated Risk Information System (IRIS) is a database of human health effects that may result from exposure to various substances found in the environment. The IRIS database is located at <http://www.epa.gov/iris>. The following toxicity information for the six prioritized MSATs was taken from the IRIS database *Weight of Evidence Characterization* summaries. This information is taken verbatim from EPA's IRIS database and represents the Agency's most current evaluations of the potential hazards and toxicology of these chemicals or mixtures.

- **Benzene** is characterized as a known human carcinogen.
- The potential carcinogenicity of **acrolein** cannot be determined because the existing data are inadequate for an assessment of human carcinogenic potential for either the oral or inhalation route of exposure.
- **Formaldehyde** is a probable human carcinogen, based on limited evidence in humans, and sufficient evidence in animals.
- **1,3-butadiene** is characterized as carcinogenic to humans by inhalation.
- **Acetaldehyde** is a probable human carcinogen based on increased incidence of nasal tumors in male and female rats and laryngeal tumors in male and female hamsters after inhalation exposure.
- **Diesel exhaust** (DE) is likely to be carcinogenic to humans by inhalation from environmental exposures. Diesel exhaust as reviewed in this document is the combination of diesel particulate matter and diesel exhaust organic gases.
- **Diesel exhaust** also represents chronic respiratory effects, possibly the primary noncancer hazard from MSATs. Prolonged exposures may impair pulmonary function and could produce symptoms, such as cough, phlegm, and chronic bronchitis. Exposure relationships have not been developed from these studies.

There have been other studies that address MSAT health impacts in proximity to roadways. The Health Effects Institute, a non-profit organization funded by EPA, FHWA, and industry, has undertaken a major series of studies to research near-roadway MSAT hot spots, the health implications of the entire mix of mobile source pollutants, and other topics. The final summary of the series is not expected for several years.

Some recent studies have reported that proximity to roadways is related to adverse health outcomes -- particularly respiratory problems¹. Much of this research is not specific to MSATs, instead surveying the full spectrum of both criteria and other pollutants. The FHWA cannot evaluate the validity of these studies, but more importantly, they do not provide information that would be useful to alleviate the uncertainties listed above and enable us to perform a more comprehensive evaluation of the health impacts specific to this project.

Relevance of Unavailable or Incomplete Information to Evaluating Reasonably Foreseeable Significant Adverse Impacts on the Environment, and Evaluation of impacts based upon theoretical approaches or research methods generally accepted in the scientific community.

Because of the uncertainties outlined above, a quantitative assessment of the effects of air toxic emissions impacts on human health cannot be made at the project level. While available tools do allow us to reasonably predict relative emissions changes between alternatives for larger projects, the amount of MSAT emissions from each of the project alternatives and MSAT concentrations or exposures created by each of the project alternatives cannot be predicted with enough accuracy to be useful in estimating health impacts. (As noted above, the current emissions model is not capable of serving as a meaningful emissions analysis tool for smaller projects.) Therefore, the relevance of the unavailable or incomplete information is that it is not possible to make a determination of whether any of the alternatives would have "significant adverse impacts on the human environment."

In this document, FHWA has provided a qualitative assessment of MSAT emissions relative to the various alternatives, and has acknowledged that some of the project alternatives may result in increased exposure to MSAT emissions in certain locations, although the concentrations and duration of exposures are uncertain, and because of this uncertainty, the health effects from these emissions cannot be estimated.

Tier Two Qualitative Project Level Assessment

As discussed above, technical shortcomings of emissions and dispersion models and uncertain science with respect to health effects prevent meaningful or reliable estimates of MSAT emissions and effects of this project. However, even though reliable methods do not exist to accurately estimate the health impacts of MSATs at the project level, it is possible to qualitatively assess the levels of future MSAT emissions under the project. Although a qualitative analysis cannot identify and measure health impacts from MSATs, it can give a basis for identifying and comparing the potential differences among MSAT emissions—if any—from the various alternatives. The qualitative assessment presented below is derived in part from a study conducted by the FHWA entitled *A Methodology for Evaluating Mobile Source Air Toxic Emissions Among Transportation Project Alternatives*, found at:

www.fhwa.dot.gov/environment/airtoxic/msatcompare/msatemissions.htm

1 On-alignment Alternatives

For each alternative in this EIS, the amount of MSATs emitted would be proportional to the vehicle miles traveled, or VMT, assuming that other variables such as fleet mix are the same for each alternative. The VMT estimated for each of the On-alignment Build Alternatives is the same as that for the No Build Alternative (See Table 1). However, MSAT emission rates will be somewhat lowered due to increased speeds on the Build Alternatives relative to the No Build Alternative; according to EPA's MOBILE6 emissions model, emissions of all of the priority MSATs except for diesel particulate matter decrease as speed increases.

Because the estimated VMT under each of the On-alignment Alternatives are the same as the No Build Alternative, it is expected there would be no appreciable difference in overall MSAT emissions among the various alternatives. Also, regardless of the alternative chosen, emissions will likely be lower than present levels in the design year as a result of EPA's national control programs that are projected to

¹ South Coast Air Quality Management District, Multiple Air Toxic Exposure Study-II (2000); Highway Health Hazards, The Sierra Club (2004) summarizing 24 Studies on the relationship between health and air quality); NEPA's Uncertainty in the Federal Legal Scheme Controlling Air Pollution from Motor Vehicles, Environmental Law Institute, 35 ELR 10273 (2005) with health studies cited therein.

reduce MSAT emissions by 57 to 87 percent between 2000 and 2020. Local conditions may differ from these national projections in terms of fleet mix and turnover, VMT growth rates, and local control measures. However, the magnitude of the EPA-projected reductions is so great that MSAT emissions in the study area are likely to be lower in the future in nearly all cases.

The additional travel lanes contemplated as part of the project alternatives will have the effect of moving some traffic closer to nearby homes, schools and businesses; therefore, under each alternative there may be localized areas where ambient concentrations of MSATs could be higher under certain Build Alternatives than the No Build Alternative. The localized increases in MSAT concentrations would likely be most pronounced along expanded roadway sections under the Deer Lake On-Alignment Alternative, Apple River/Clover Lake On-Alignment Alternative, Range On-Alignment Alternative, Joel Flowage On-Alignment Alternative, Turtle Lake Alternative 4 (Through-town), Poskin On-Alignment Alternative, and Barron Alternative D (Through-town). However, as discussed above, the magnitude and the duration of these potential increases compared to the No-build alternative cannot be accurately quantified due to the inherent deficiencies of current models. In sum, when a highway is widened and, as a result, moves closer to receptors, the localized level of MSAT emissions for the Build Alternative could be higher relative to the No Build Alternative, but this could be offset due to increases in speeds and reductions in congestion (which are associated with lower MSAT emissions). Also, MSATs will be lower in other locations when traffic shifts away from them. However, on a regional basis, EPA's vehicle and fuel regulations, coupled with fleet turnover, will over time cause substantial reductions that, in almost all cases, will cause region-wide MSAT levels to be significantly lower than today.

Table 1

VMT by Alternative

Alternative Number	Alternative Name	Length (km)	AADT	VMT
	No Build (Segment I)	7.9 (12.7)	12,300	97,170
1A	Deer Lake On-Alignment	7.9 (12.7)	12,300	97,170
1B	Deer Lake Southern Alignment	8.0 (12.9)	12,300	98,400
1C	Deer Lake Far South Alignment	8.2 (13.2)	12,300	100,860
	No Build (Segment II)	4.0 (6.4)	11,500	46,000
2	Apple River/Clover Lake On-Alignment	4.0 (6.4)	11,500	46,000
	No Build (Segment III)	3.2 (5.1)	9,900	31,680
3A	Range On-Alignment	3.2 (5.1)	9,900	31,680
3B	Range Northern Alignment	3.3 (5.3)	9,900	32,670
3C	Range Southern Alignment	3.3 (5.3)	9,900	32,670
	No Build (Segment IV)	3.5 (5.6)	9,900	34,650
4A	Joel Flowage On-Alignment	3.5 (5.6)	9,900	34,650
4B	Joel Flowage Northern Alignment	3.6 (5.8)	9,900	35,640
	No Build (Segment V)	6.8 (10.9)	10,700	72,760
5A	Turtle Lake Alternative 1 (Short Southern Bypass)	8.1 (13.1)	6,700	54,270
5B	Turtle Lake Alternative 2 (Long Southern Bypass)	7.6 (12.2)	6,100	46,360
5C	Turtle Lake Alternative 3 (North Bypass)	7.6 (12.2)	7,100	53,960
5D	Turtle Lake Alternative 4 (Through-town)	6.8 (13.1)	10,700	72,760
	No Build (Segment VI)	5.8 (9.3)	10,800	62,640
6A	Poskin On-Alignment	5.8 (9.3)	10,800	62,640
6B	Poskin Southern Alignment	5.8 (9.3)	10,800	62,640
	No Build (Segment VII)	8.4 (13.5)	15,600	131,040
7A	Barron Alternative A (Short Southern Bypass)	8.5 (13.7)	9,700	82,450
7B	Barron Alternative B (Long Southern Bypass)	8.5 (13.7)	8,500	72,250
7C	Barron Alternative C (Northern Bypass)	9.7 (15.6)	8,900	86,330
7D	Barron Alternative D (Through-town)	8.4 (13.5)	15,600	131,040

2. Bypass Alternatives

For each alternative in this EIS, the amount of MSATs emitted would be proportional to the vehicle miles traveled, or VMT, assuming that other variables such as fleet mix are the same for each alternative. The VMT estimated for the No Build Alternative is slightly lower than that for many of the more rural Bypass Alternatives due to a slightly longer travel length on the bypass alternatives. This increase in VMT would lead to higher MSAT emissions for the action alternative along the highway corridor. The emissions increase is offset somewhat by lower MSAT emission rates due to increased speeds; according to EPA's MOBILE6 emissions model, emissions of all of the priority MSATs except for diesel particulate matter decrease as speed increases. The extent to which these speed-related emissions decreases will offset VMT-related emissions increases cannot be reliably projected due to the inherent deficiencies of technical models.

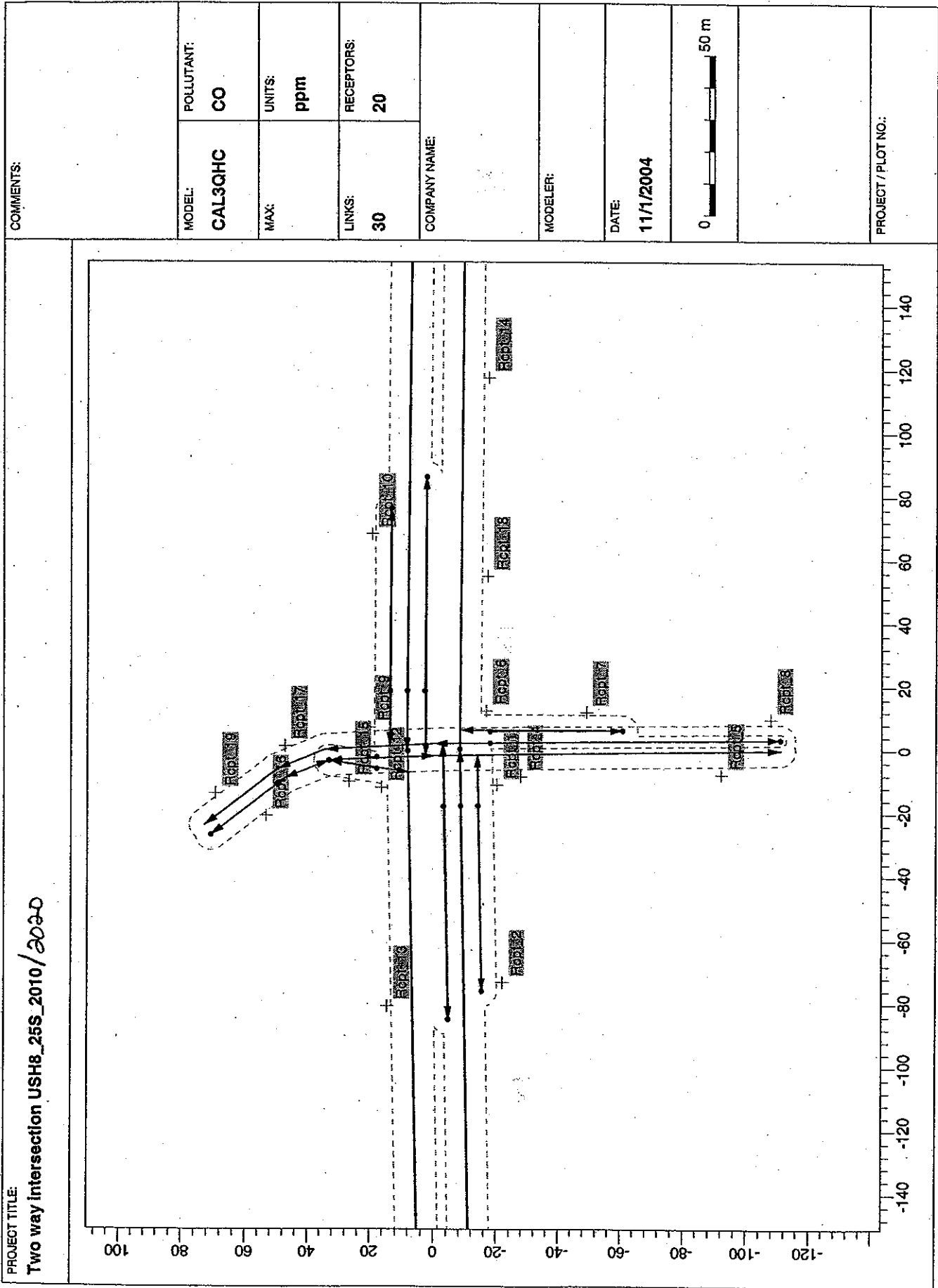
Because the VMT for the No Build Alternative is significantly higher than that for any of the Turtle Lake or Barron Bypass Build Alternatives due to decreased traffic volume predicted on the bypass alternatives, higher levels of regional MSATs are not expected from any of the Turtle Lake or Barron Bypass Build Alternatives compared to the No Build (See Table 1).

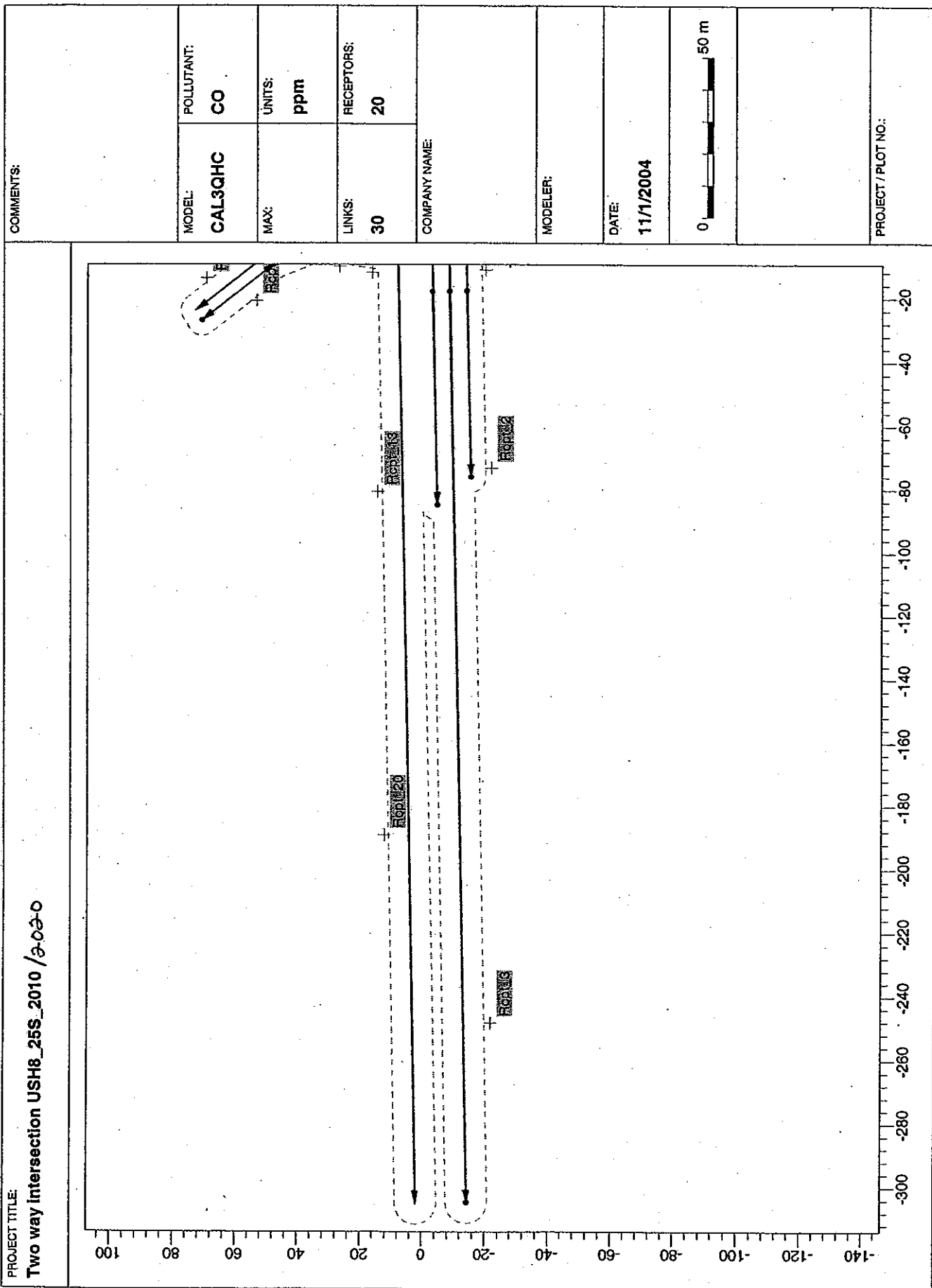
Regardless of the alternative chosen, emissions will likely be lower than present levels in the design year as a result of EPA's national control programs that are projected to reduce MSAT emissions by 57 to 87 percent from 2000 to 2020. Local conditions may differ from these national projections in terms of fleet mix and turnover, VMT growth rates, and local control measures. However, the magnitude of the EPA-projected reductions is so great (even after accounting for VMT growth) that MSAT emissions in the study area are likely to be lower in the future in virtually all locations.


Because of the specific characteristics of the project alternatives (i.e. bypass alternatives), under each alternative there may be localized areas where VMT would increase, and other areas where VMT would decrease. Therefore it is possible that localized increases and decreases in MSAT emissions may occur. The localized increases in MSAT emissions would likely be most pronounced along the new roadway sections that would be built under the Deer Lake Southern and Far Southern Alignments, Range Northern and Southern Alignments, Joel Flowage Northern Alignment, and Poskin Southern Alignment. However, even if these increases do occur, they too will be substantially reduced in the future due to implementation of EPA's vehicle and fuel regulations.

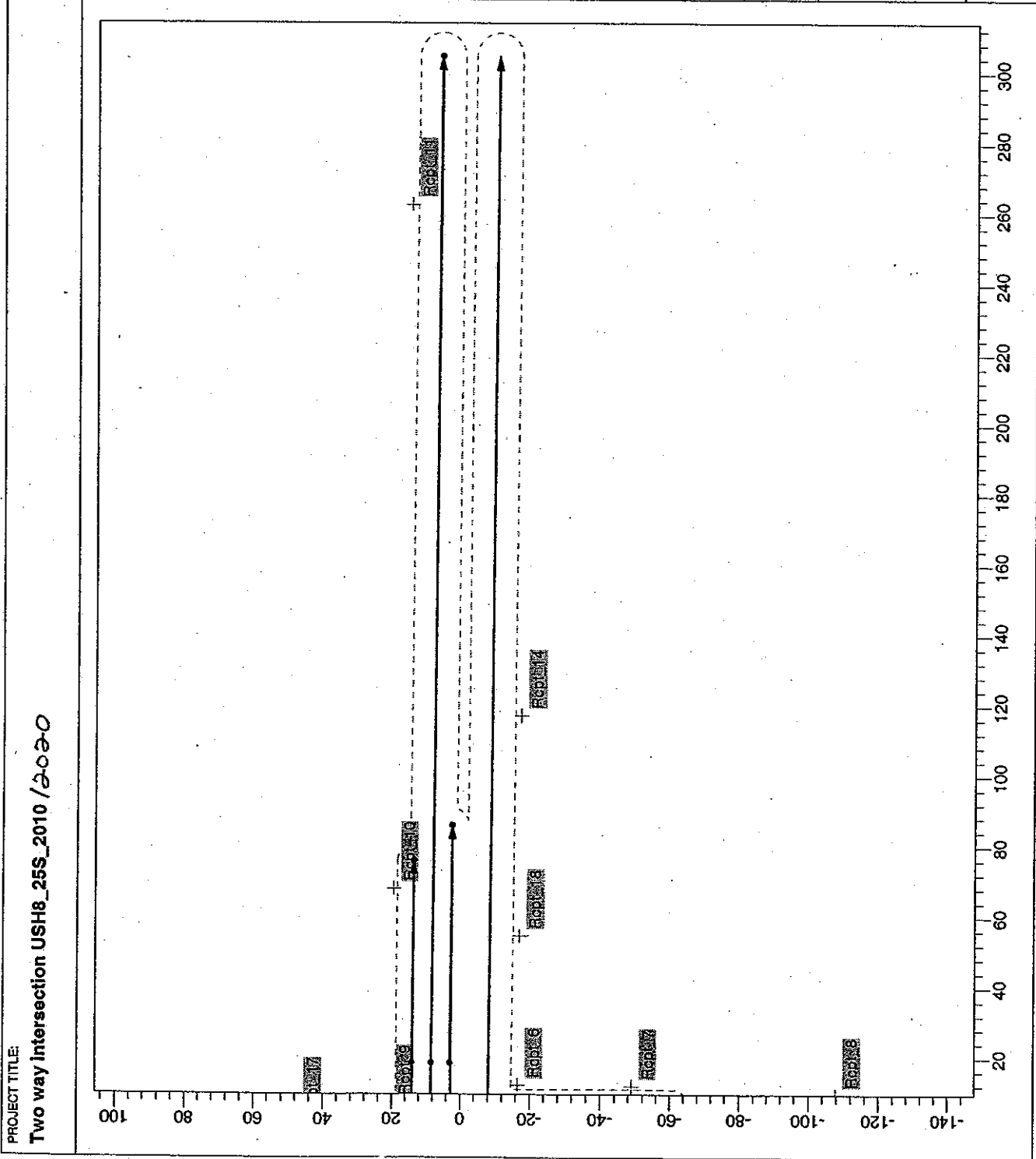
In sum, under all Build Alternatives in the design year it is expected there would be reduced MSAT emissions in the immediate area of the project, relative to the No Build Alternative, due to decrease in traffic volume assigned to the Turtle Lake and Barron Bypasses, an increase in traffic speeds on the rural area bypasses, and due to EPA's MSAT reduction programs. In comparing various project alternatives, MSAT levels could be higher in some locations than others, but current tools and science are not adequate to quantify them. However, on a regional basis, EPA's vehicle and fuel regulations, coupled with fleet turnover, will over time cause substantial reductions that, in almost all cases, will cause region-wide MSAT levels to be significantly lower than today.

WIS 25 S





COMMENTS:	
MODEL: CAL3QHC	POLLUTANT: CO
MAX:	UNITS: ppm
LINKS: 30	RECEPTORS: 20
COMPANY NAME:	
MODELER:	
DATE: 11/1/2004	
	
PROJECT / PLOT NO.:	



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